

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEYO JOHNSON,

Plaintiff,

v.

EVERYREALM INC., COMPOUND ASSET MANAGEMENT LLC, REALM METAVERSE REAL ESTATE INC., REPUBLIC, REPUBLIC CRYPTO LLC, REPUBLIC REALM MANAGER LLC, REPUBLIC REALM INC., REPUBLIC OPERATIONS LLC, OPENDEAL INC., OPENDEAL PORTAL LLC, JANINE YORIO, in her individual and professional capacities, and JULIA SCHWARTZ, in her individual and professional capacities.

Defendants.

Index No. 1:22-cv-06669(PAE)(GWG)

**DECLARATION OF
TEYO JOHNSON**

Teyo Johnson, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I served as the Director of Strategic Partnerships for. I submit this declaration based upon my personal knowledge in support of the Opposition to the Motion to Compel Arbitration on behalf of myself in the above-captioned matter.

2. Now that I have filed this lawsuit, my goal is to hold Defendants accountable in open, public court for the sexual harassment and other abuse I experienced.

3. Defendants' allegations about my behavior and character in their Motion to Compel Arbitration are false.

4. Because Defendants threatened to sue me and because the cost splitting provision in the Arbitration and Equitable Remedies provision could have bankrupted me, I had no choice but to file this lawsuit in this Court.

5. Much of my mistreatment at Everyrealm stems from Ms. Yorio's sexual harassment that began in my preemployment interview and did not stop until I was terminated.

6. I am aware of other Black men at Everyrealm who experienced pervasive sexual harassment at the hands of Ms. Yorio and Defendants. I have personally read allegations made by another Black male employee after they were submitted with the Equal Employment Opportunity Commission that indicate that the sexual harassment I experienced was likely caused, at least in large part, by Ms. Yorio's improper fetishization of Black men.

7. I have been made aware by a friend who is neither a party nor witness to this case that Janine Yorio contacted this person in an attempt to pressure this person to encourage me to drop my claims.

8. I have been made aware that this person declined to do so.

9. I felt I had no choice but to file in court.

10. I want my day in court.

Pursuant to 28 U.S.C. 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: September 9, 2022

A handwritten signature in black ink, appearing to read "John" or "John Doe".